



FAA Aviation Maintenance Technician School
#9MUT613K

August 13, 2021

U.S. Department of Transportation
Docket Operations
West Building Ground Floor, Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590

U.S. DEPARTMENT OF
TRANSPORTATION
201 AUG 23 P 11:3
DOCKET OPERATIONS

Subject: Petition for exemption from Code of Federal Regulations 14 CFR, Part 65.75(a) to allow the Aviation Mechanic (AMG) written tests to be administered after completing the corresponding section of the curriculum.

Dear Sir or Madam,

MIAT College of Technology operates an FAA Approved Aviation Maintenance Technician School (AMTS) in Houston, Texas under Air Agency Certificate #9MUT613K.

PETITION:

MIAT College of Technology is requesting an exemption from 14 CFR, Part 65.75(a) to allow the Aviation Mechanic written tests (AMG, AMA, AMP) to be administered after completing the corresponding section of the curriculum.

14 CFR Part 65.75(a) Knowledge Requirements: Title 14 of the Code of Federal Regulations, Part 65.75(a) prescribes that applicants must pass a written test, "after meeting the experience requirements of Part 65.77."

§65.77 requires applicants to complete training and, "present either an appropriate graduation certificate or certificate of completion from a certificated aviation maintenance technician school" before being eligible to take the written test for a certificate or rating.

Relief Sought: MIAT College of Technology is seeking exemption from 14 CFR Part 65.75(a) to allow students enrolled in its Part 147 Aviation Maintenance Technician School to take the Aviation Mechanic written tests (AMG, AMA, AMP) after completing the corresponding section of the curriculum, prior to meeting the experience requirements of §65.77.

Person(s) to be covered by the exemption: MIAT College of Technology #9MUT613K and students enrolled in its Aviation Maintenance Technology program, Airframe and Powerplant Technician program, Airframe Technician program or Powerplant Technician program.

Information, views, or arguments to support the action sought: Testing immediately after learning is a universally accepted instructional principle that reinforces learning, and is academically sound. This is currently allowed with both the Airframe and Powerplant curriculums, but is not allowed at the completion of the General curriculum.

This petition is structured to provide an opportunity for testing after the completion of any section of the curriculum (General, Airframe, Powerplant) regardless of the type of enrollment.

MIAT College of Technology has established a procedure to trigger an audit when our students have completed each section of the training (Air Science, Airframe and Powerplant.) The same procedure would be used to identify and audit students who would qualify to take the AMG written test after completion of the General curriculum, the AMA written test after completion of the Airframe curriculum, and AMP after completion of the Powerplant curriculum. A certificate of completion would only be issued after the successful completion of the Air Science, Airframe or Powerplant sections of the curriculum.

The time penalty incurred by beginning the testing process before the completion of the Airframe or Powerplant sections of the curriculum would be more than offset by the academic soundness of immediate testing.

Public Interest: The public interest will be served by allowing aviation maintenance technician students to take the FAA written test covering a body of knowledge immediately following completion of their studies of that material. Student learning will be enhanced and reinforced by the immediate feedback provided by the testing experience. This immediate feedback, coupled with a sense of accomplishment, is expected to encourage students to continue their studies and reduce dropout rates.

This petition does not differ materially from others on record, and those requests have been deemed to be in the public interest.

Impact on Safety: A procedure is currently in place to identify and report students who are eligible to take the FAA written, oral and practical tests. The same procedure would be used to identify and report students who would qualify to take the Aviation Mechanic written tests after the completion of the corresponding section of the curriculum. All other requirements governing written testing, including time requirements for licensure completion would remain unchanged. A level of safety equal to that provided by this rule would be provided.

Economic Impact: There will be no impact on the economy.

SUMMARY OF PETITION

The purpose of this petition is to allow the Aviation Mechanic written test (AMG, AMA, AMP) to be administered prior to completion of the Airframe or Powerplant sections of the curriculum.

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14 CFR, Part 65.75(a) Knowledge Requirements:

Relief Requested: MIAT College of Technology is petitioning for an exemption from this rule to allow students to take the written examination after completing the corresponding section of the curriculum.

MIAT College of Technology appreciates any assistance you may be able to provide us in accomplishing this petition.

Respectfully,

A handwritten signature in black ink, appearing to read 'Titus Hubbard', with a stylized, flowing script.

Titus Hubbard
Director of Education